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18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY and
20 FIDELITY NATIONAL TITLE AGENCY OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-02231-APG-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

COMES NOW defendants Fidelity National Title Insurance Company (“Fidelity”) and
Fidelity National Title Agency of Nevada, Inc. (“Fidelity Agency”) (collectively “Defendants”)
and plaintiff Wells Fargo Bank, N.A. (“Wells Fargo”), by and through their respective attorneys
of record, which hereby agree and stipulate as follows:

1 1. On December 21, 2021 Wells Fargo filed its complaint in the Eighth Judicial
2 District Court for the State of Nevada;

3 2. On December 22, 2021, Fidelity removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Fidelity's response to Wells Fargo's complaint is currently due on January 25,
6 2022, while Fidelity Agency's response is currently due on January 24, 2022;

7 4. Counsel for Defendants request a 31-day extension for Fidelity Agency (30 days
8 for Fidelity) through and including Wednesday, February 23, 2022, for Defendants to file their
9 respective responses to Wells Fargo's complaint to afford Defendants' counsel additional time to
10 review and respond to Wells Fargo's complaint.

11 5. Counsel for Wells Fargo does not oppose the requested extension;

12 6. This is the first request for an extension made by counsel for Defendants, which is
13 made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Wednesday, February 23, 2022.

3 Dated: January 19, 2022

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE INSURANCE

COMPANY and FIDELITY NATIONAL

8 TITLE AGENCY OF NEVADA, INC.

9 Dated: January 19, 2022

WRIGHT FINLAY & ZAK, LLP

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11 By: /s/-Lindsay D. Dragon

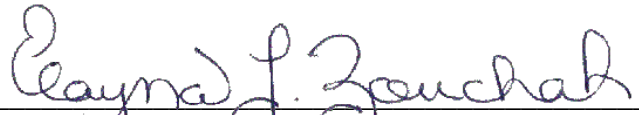
12 LINDSAY D. DRAGON

Attorneys for Plaintiff

13 WELLS FARGO BANK, N.A.

14 **IT IS SO ORDERED.**

15 Dated this 19th day of January, 2022.

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18 ELAYNA J. YOUCHAK

UNITED STATES MAGISTRATE JUDGE